

Douglas A. Ducey
Governor



Craig C. Brown
Director

ARIZONA DEPARTMENT OF ADMINISTRATION
ARIZONA STRATEGIC ENTERPRISE TECHNOLOGY OFFICE
(ASET)
ARIZONA 9-1-1 PROGRAM OFFICE
100 NORTH FIFTEENTH AVENUE • SUITE 400
PHOENIX, ARIZONA 85007
(602) 542-2250

State of Arizona 9-1-1 Program Office Support of NSGIC Comments on NEAD Privacy and Security Plan

The State of Arizona 9-1-1 Program Office provides 9-1-1 funding and oversight for Arizona's 9-1-1 system. Arizona's support of the 9-1-1 system includes guidance in the development of the Master Street Address Guide (MSAG) for the Enhanced 9-1-1 system as well as for the development of GIS for the NG9-1-1 system. Guidelines and best practices are provided for the proper development, maintenance and validation of these important databases.

The Arizona 9-1-1 Program Office respectfully submits the following support to the National States Geographic Information Council (NSGIC) comments to the Public Safety and Homeland Security Bureau's Request for Comment on the "Wireless Carriers' Privacy and Security Plan (Plan) for the National Emergency Address Database (NEAD)" (PS Docket No. 07-114):

The Plan provides six (6) bulleted statements that describe the consumer privacy protections that will be incorporated into the operation of the NEAD Platform on page 4-5 of the document. NSGIC's concerns lie with the fourth bullet which states:

- *"Except as may be required by applicable law, information contained in the NEAD Platform will not be disclosed to third parties, including government entities, other than for E911 purposes. The NEAD Administrator will follow a defined procedure to assess and respond to valid governmental requests for Information."*

NSGIC finds both sentences vague and not providing enough information as to what is considered an allowable use "for E911 purposes" or what specific qualifiers or guidelines used in the "defined procedure to assess and respond to government requests" may cause a governmental request to be denied.

In addition to the comments provided by the NSGIC organization, the State of Arizona 9-1-1 Program believes it is important to note that the use of confidential and/or proprietary information provided by 9-1-1 Service Providers, Wireless Service Providers and telephone companies is a common practice today. The appropriate

and necessary safeguards are in place to protect information provided from unlawful use or dissemination. The inclusion of the NEAD data for the maintenance and validation of the MSAG and LVF databases is not only necessary but would be in accordance with supported current practices.

The State of Arizona 9-1-1 Program Office appreciates the opportunity to provide this additional feedback on the NEAD Privacy and Security Plan. The 9-1-1 system's ability to participate in the validation of location information is paramount to the success of the system and the emergency responders and citizens that rely on it.